

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

EARL GAVIN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 7:18-cv-00523-DCC-JDA
)	
EXPERIAN INFORMATION)	
SOLUTIONS, INC.; TRANS UNION)	
LLC; and EQUIFAX, INC.,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Trans Union LLC (“Trans Union”), with the consent of Plaintiff Earl Gavin (“Plaintiff”), files this Consent Motion for Extension of Time to File Answer or Otherwise Respond to Plaintiff’s Complaint, pursuant to FED. R. CIV. P. 6(b)(1), and would respectfully show the Court as follows:

1. The time to respond to the Complaint has not expired. The current deadline for Trans Union to respond is March 26, 2018. Trans Union’s counsel continues to review the allegations of the Complaint and requires additional time to respond to the same in a meaningful fashion. Trans Union seeks a 30-day extension to April 25, 2018.

2. Plaintiff has agreed to extend the deadline in which Trans Union has to file its appropriate responsive pleading to Plaintiff’s Complaint by 30 days.

3. This is the first request for extension of this deadline. No party would be prejudiced by the extension and the extension of time would not affect other deadlines. The case was recently filed and no substantive activities have taken place.

The parties do not request oral arguments on the Motion.

WHEREFORE, Defendant Trans Union, with the consent of Plaintiff Earl Gavin, hereby requests that the Court enter an Order granting the Consent Motion for Extension of Time providing Trans Union with an extension of time to file responsive pleadings to the Complaint until April 25, 2018.

Respectfully Submitted,

s/Wilbur E. Johnson _____

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COUNSEL FOR TRANS UNION LLC

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been served on the following non-CM/ECF participant via First Class Mail and Electronic Mail on the 20th day of March, 2018:

Earl Gavin
300 Marion Avenue
Gaffney, SC 29341
Egav1986@gmail.com
Plaintiff *Pro Se*

s/Wilbur E. Johnson

Wilbur E. Johnson